

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

COBBLESTONE WIRELESS, LLC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 7:24-cv-00232-ADA

JURY TRIAL DEMANDED

**JOINT STIPULATION EXTENDING THE DEADLINE TO FILE
JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER**

TO THE HONORABLE JUDGE:

Pursuant to the Court’s Amended Standing Order Regarding Joint or Unopposed Request to Change Deadlines dated March 7, 2022, Cobblestone Wireless, LLC, (“Cobblestone” or “Plaintiff”) and Defendant Apple Inc. (“Apple” or “Defendant”) (collectively, the “Parties”) hereby provide notice that the Parties have agreed to an extension of the Parties deadline to file a joint motion for entry of a protective order to May 28, 2025.

Cobblestone and Apple are making progress in the negotiation of the terms of a protective order for joint submission to the Court. The Parties negotiations are ongoing but have not been completed. Currently, the deadline for the Parties to submit a joint motion for entry of a protective order is April 25, 2025. To afford the Parties additional time to meet and confer, the Parties have agreed to extend the deadline to file the joint motion for entry of a protective order for 33 days, until May 28, 2025. This new deadline will be approximately one and one-half months before fact discovery opens in this case and will not affect any other deadline in this case. Extending the deadline will allow the parties time to continue their negotiations, narrow any disputed issues,

and present the Court with either an agreed protective order or a joint submission that minimizes any disputed issues.

The Parties affirm that this extension meets all of the criteria required under the Standing Order for the Court to automatically grant the extensions. Specifically, the Parties affirm as follows:

1. This request is agreed between the parties.
2. This request does not change the date of any hearing, trial, or other Court date,
and
3. This request does not extend any deadline of a final submission that affects the Court's ability to hold a scheduled hearing, trial, or Court event.

Dated: April 24, 2025.

/s/ Reza Mirzaie Reza Mirzaie

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Certificate of Service

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served on this 24th day of April, 2025, with a copy of the foregoing via the Court's CM/ECF system.

/s/ Steven J. Wingard
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